

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANDREA TANTAROS,

Plaintiff,

- against -

FOX NEWS NETWORK, LLC, ROGER AILES, WILLIAM
SHINE, IRENA BRIGANTI, PETER A. SNYDER,
DISRUPTOR, INC. and JOHN DOES 1-50,

Defendants.
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17 Civ. 2958 (GBD)

REPLY DECLARATION OF LINDA C. GOLDSTEIN

LINDA C. GOLDSTEIN, an attorney duly admitted to practice before this Court,
declares under penalty of perjury as follows:

1. I am a partner of Dechert LLP, 1095 Avenue of the Americas, New York, New York, counsel to Defendants Fox News Network, LLC (“Fox News”) and Irena Briganti in this case. I submit this declaration to describe the sources of certain emails produced by Fox News in its arbitration against Plaintiff Andrea Tantaros, which she refers to at pages 12 and 16 of her memorandum in opposition to the pending motions to dismiss the Amended Complaint [ECF Doc. 147 and ECF Doc. 150].

2. On December 4, 2017, almost two months before the Amended Complaint was filed, Defendant Fox News produced approximately 25,250 pages of documents to Plaintiff in response to her request for documents in the pending arbitration, *Fox News Network, LLC v. Andrea Tantaros*, Case No. 01-16-0001-7288 (AAA). Dechert attorneys working under my supervision have reviewed the Fox News production and determined that it includes 134 emails sent to or from Plaintiff’s personal email addresses.

3. The majority of these emails were produced from Plaintiff's own Fox email account:

(a) Plaintiff sent or forwarded messages from her personal email accounts to her Fox email account, and vice versa. Fox produced 63 such emails from Plaintiff's Fox email account.

(b) Plaintiff also cc'd or bcc'd her personal email accounts when communicating on her Fox email account, or cc'd or bcc'd her Fox email account when communicating on her personal email account. Fox produced 12 such emails from Plaintiff's Fox email account.

(c) Fox employees and other third parties sent emails to both Plaintiff's Fox email account and her personal email account. Fox produced 17 such emails from Plaintiff's Fox email account.

4. Plaintiff also communicated with other Fox employees using her personal email accounts. Fox produced 23 such emails from the Fox email accounts of other Fox employees.

5. Nineteen of the produced emails to or from Plaintiff's personal email accounts were sent to or from men that Plaintiff has accused of sexual harassment. Fox received copies of those emails from the accused men during the course of Fox's investigation of Plaintiff's claims.

I declare under penalty of perjury that the foregoing is true and accurate. Executed at New York, New York on April 6, 2018.

/s/ Linda C. Goldstein
Linda C. Goldstein